

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

NELSON ROUETTE and JAY NEARIS,

Plaintiffs and
Counterclaim Defendants,

vs.

MACHINE & ELECTRICAL
CONSULTANTS, INC., FABIAN DUBE,
and NORM CREPEAU,

Defendants and
Counterclaim Plaintiffs

Civil Action No. 04-11534-MAP

MACHINE & ELECTRICAL
CONSULTANTS, INC.

Third-Party Plaintiff

vs.

QUALITY MACHINE SOLUTIONS,
INC.

Third-Party Defendant

JOINT MOTION TO RESCHEDULE CASE MANAGEMENT CONFERENCE

Now come all parties to this matter and respectfully request that the Case Management Conference originally scheduled for October 21, 2005, and recently rescheduled to October 25, 2005, be further rescheduled for the following reasons:

1. The parties recently received notice that the October 21, 2005 Case Management Conference has been postponed to October 25, 2005.
2. Jeffrey D. Clements, counsel for Defendants Machine & Electrical Consultants, Inc., Fabien Dube and Norman Crepeau, is unavailable on October 25, 2005,

returning to Massachusetts on the evening of October 26, 2005 from long-scheduled travel to Montana.

3. Keith R. Jacques, counsel admitted *pro hac vice* for Defendants Machine & Electrical Consultants, Inc., Fabien Dube and Norman Crepeau, has previously scheduled depositions out-of-state on October 26, 2005.

4. On October 13, 2005 counsel learned that Plaintiff Jay Nearis has filed for bankruptcy (Boston-05-21574).

5. The parties respectfully request that the Case Management Conference be rescheduled to November 17, November 23, or such date as the Court deems appropriate.

Respectfully submitted,

NELSON ROUETTE, JAY NEARIS and
QUALITY MACHINE SOLUTIONS,
INC.

by their attorneys,

/s/ Adam J. Basch
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MACHINE & ELECTRICAL
CONSULTANTS, INC., FABIAN DUBE, and
NORM CREPEAU,

by their attorneys,

/s/ Jeffrey D. Clements
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/s/ Keith R. Jacques
Keith R. Jacques, *pro hac vice*
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DATED: October 17, 2005